

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

February 23, 1982

Mr. Jack R. Niemi, P.E. Chief, Engineering Division U.S. Army Engineer District, St. Louis 210 Tucker Boulevard, North St. Louis, Missouri 63101

Attention: Mr. Dave Leake

Dear Mr. Niemi:

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Several programs within our Regional Office have reviewed the draft of the section entitled, Pine Ford Future Without A Project. We assume this section is being developed as part of the environmental impact statement for the proposed Pine Ford Dam and Reservoir.

We are unable to provide specific comments on the report since we have not received any specific information on the project. Apparently our office was not included in the recent distribution of project plans. Mr. Leake is providing us the project-specific information. When we receive this material, we will be able to provide detailed comments.

There are, however, several general comments that can be provided on the content and format of the without-project condition. These comments are as follows:

- . The reference to Federal action needs to be clarified. Corps efforts in the Basin are not necessarily the only Federal involvement. There are several Federal agencies, including ours, that may address the needs of the Basin.
- . There are several references to flooding potential, floodplain zoning, displacements, etc., in the Big River and Lower Meramec Basins. These anticipated events need to be coordinated with the results of the recently released Lower Meramec Valley Flood Damage Reduction Study.
- . The Location Quotients are calculations based on past employment. They do not project future conditions as is the intent of the entire section.
- . The without-project scenario identifies several actions that would occur if the Pine Ford project is not constructed. We assume the environmental impact statement will also discuss alternatives to the reservoir and describe whether the project goals can be met with the alternatives.

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. There are several statements, evaluations, and conclusions stated in the report that need to be documented. The request for rationale or source of information from us should be extended to the Corps.

A meeting has been tentatively scheduled for March 4 or 5, 1982, to discuss our comments and those of other agencies. By that time we hope to have received detailed project information and completed a more extensive review of the without-project condition.

We will continue to coordinate our efforts with Mr. Leake. If you would like to discuss any of these general comments before the meeting, please contact Robert Fenemore of my staff. He can be reached at FTS 758-2921.

Sincerely yours,

Charles H. Hajinian, Chief Environmental Review Branch

cc: Dave Leake, COE